

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,**

v.

**JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.**

CIVIL NO. 97-2459 (GAG)

**DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES; UNFAIR
LABOR PRACTICES; BREACH OF
COLLECTIVE BARGAINING
AGREEMENT**

**TRIAL BY JURY IS HEREBY
REQUESTED**

MOTION TO AMEND PROPOSED PRE-TRIAL ORDER

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. Last Friday December 29, 2006 a Proposed Pre-Trial Order was filed in the above captioned case as docket number 336.
2. The above mentioned document did not include an attachment by Defendant of the August 4, 2003 Judgment from the U.S. Court of Appeal for First Circuit ("1st Circuit") in COA Case No. 02-2190.
3. Additionally, Plaintiff should have include as the number one witness in his part himself Angel David Morales-Vallellanes who was involuntary excluded from the witness list as well as the following exhibits from 151 to 156:

“151 – Certified letter from Miguel Miranda to Ronald Baraga 3/1/06

152 – Certified letter from Miguel Miranda to Frank Silva 3/2/06

153 – Letter on hand to Ronald Baraga from Miguel Miranda 3/1/06

154 – Letter on hand to Frank Silva from Miguel Miranda 3/2/06

155 – US Postal Inspection Service Publication 146

156 – US Postal Inspection Service Publication 308”

4. It is included with this motion an Amended Proposed Pre-Trial Order with the document and information mentioned above.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above and **GRANT** the Amended Proposed Pre-Trial Order.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on January 3rd, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

S/MIGUEL E. MIRANDA-GUTIERREZ
MIGUEL E. MIRANDA-GUTIERREZ, ESQ.
USDC 203110
ATTORNEY FOR PLAINTIFF
P.O. BOX 192271
San Juan, Puerto Rico 00919-2271
TEL: (787) 282-0022
FAX: (787) 753-7655